

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DEBORAH M. LUMBARD,

Plaintiff,

v.

THE PRUDENTIAL INSURANCE COMPANY  
OF AMERICA and  
STATE STREET BANK AND TRUST CO.,

Defendants.

Case No. 05-CV-11124-MEL

**JOINT MOTION TO EXTEND TIME**  
**TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), plaintiff Deborah M. Lumbard ("Plaintiff") and defendant State Street Bank & Trust Co. ("Defendant"), by and through their undersigned counsel, respectfully move the Court to extend by twenty (20) days the time in which Defendant may answer or otherwise respond to the Complaint. In support of this motion, the parties state as follow:

1. The deadline for Defendant's responsive pleading is currently June 22, 2005;
2. Defendant needs additional time to investigate and prepare its responsive pleading to the Complaint;
3. Plaintiff assents to this motion; and
4. This Motion is not intended to delay the proceedings in this matter.

WHEREFORE, the parties respectfully request that the Court extend the time in which Defendant may answer or otherwise respond to the Complaint by twenty days, through and including July 12, 2005.

Respectfully submitted,

DEBORAH M. LUMBARD

STATE STREET BANK & TRUST CO.

By her attorney,

By its attorneys,

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Dated: June 22, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document was served upon the attorney of record for each other party by first-class mail on June 22, 2005.

Laurie Drew Hubbard  
Laurie Drew Hubbard

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